

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH MULL, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

GOTHAM DISTRIBUTING
CORPORATION AND OLD SCHOOL
VENTURES, INC., individually and
collectively d/b/a OLDIES.COM

Defendants.

NO. 2:24-cv-06083-GJP

JUDGE GERALD J. PAPPERT

**STIPULATION AND [PROPOSED] ORDER FURTHER EXTENDING
DEFENDANT OLD SCHOOL VENTURES' TIME TO RESPOND TO
COMPLAINT**

WHEREAS, on November 13, 2024, Plaintiff Joseph Mull (“Plaintiff”) filed his Complaint (Dkt. 1) against Defendants Gotham Distributing Corporation (“Gotham”) and Old School Ventures, Inc., d/b/a Oldies.com (“Old School Ventures”; and, together with Plaintiff and Gotham, the “Parties”);

WHEREAS, Defendants’ response to the Complaint was due on or before December 27, 2024 (Dkts. 5–6);

WHEREAS, on January 3, 2025, the Parties stipulated and agreed to a 30-day extension of time to respond until January 27, 2025.

WHEREAS, on January 24, 2025, the Parties stipulated and agreed to a 30-day extension of time to respond until February 26, 2025.

WHEREAS, on January 28, 2025, the Court denied the Parties’ stipulation to extend Defendants’ time to respond for failing to provide a reason for the need for an extension.

WHEREAS, on January 30, 2025, the Parties stipulated and agreed to a 30-day extension of time to respond until February 26, 2025 in order to provide Defendants additional time to adequately investigate the allegations in the Complaint, which was delayed in part by limited availability during the holiday season.

WHEREAS, on February 28, 2025, Plaintiff and Old School Ventures stipulated and agreed to a 14-day extension of time to respond until March 12, 2025 in order to provide Plaintiff and Old School Ventures additional time to continue to exchange information informally in order to explore a potential resolution.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiff and Old School Ventures, subject to the Court's approval, that:

1. Old School Ventures shall respond to Plaintiff's Complaint on or before March 12, 2025.

Dated: March 3, 2025

/s/ Noelle B. Torrice

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Counsel to Plaintiff

*Counsel to Defendant Old School
Ventures, Inc.*

SO ORDERED, this _____, day of _____, 2025.

The Honorable Gerald J. Pappert